

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Honorable Karen M.  
Williams,  
Magistrate Judge

**THE ZHP PARTIES' MOTION FOR PROTECTIVE ORDER  
PRECLUDING THE DEPOSITION OF ZHP PRESIDENT BAOHUA CHEN**

Zhejiang Huahai Pharmaceutical Co., Ltd, Huahai US, Inc., Princeton  
Pharmaceutical Inc., and Solco Healthcare U.S., LLC (collectively the "ZHP  
Parties"), pursuant to this Court's May 3, 2021 Order ([Dkt. 1217](#)), file this Motion  
for Protective Order and aver as follows:

1. In support of the instant motion, the ZHP Parties will rely on their  
accompanying brief, exhibits, and proposed order.

May 17, 2021

Respectfully submitted,

By: /s/ Seth A. Goldberg

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